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7  
8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11  
12 SAN FRANCISCO DIVISION

12 SECURITIES AND EXCHANGE COMMISSION,

Case No. 3:14-CV-02743-HSG

13 Plaintiff,

14 v.

15 SALEEM KHAN, ET AL.,

16 Defendants.

**STIPULATION AND ORDER  
SUSPENDING DEADLINES AS TO  
DEFENDANT RANJAN MENDONSA**

1 Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) and Defendant  
 2 Ranjan Mendonsa hereby submit the following Stipulation and Proposed Order, and request that the  
 3 Court suspend upcoming deadlines as to Defendant Mendonsa, as follows:

4 WHEREAS, counsel for the Commission and counsel for Defendant Mendonsa have been  
 5 working for months to determine whether a settlement of the Commission’s case as to Defendant  
 6 Mendonsa could be reached;

7 WHEREAS, following a settlement conference before Magistrate Judge Ryu on May 26,  
 8 2015, counsel for the Commission and counsel for Defendant Mendonsa arrived at a proposed  
 9 settlement, subject to one contingency (Dkt. No. 80);

10 WHEREAS, pursuant to Magistrate Judge Ryu’s order of May 27, 2015 (Dkt. No. 80), on  
 11 June 24, 2015, Defendant Mendonsa reported satisfactorily to Judge Ryu regarding that contingency;

12 WHEREAS, the Commission’s counsel expects to recommend the proposed settlement to the  
 13 Commission for consideration and approval or disapproval;

14 WHEREAS, the process for obtaining Commission consideration and approval requires a  
 15 formal presentation of an offer to the Commissioners who sit in Washington, D.C., and given the  
 16 press of their business, the process typically takes approximately eight weeks to complete;

17 WHEREAS, in anticipation of settlement, counsel for the Commission and counsel for  
 18 Defendant Mendonsa previously stipulated to extend the time for Defendant Mendonsa to answer the  
 19 Complaint to September 8, 2015 (Dkt. No. 82);

20 WHEREAS, Defendant Mendonsa will lose much of the value of making a settlement offer if  
 21 he is nevertheless required to participate in the upcoming events;

22 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties that  
 23 Defendant Mendonsa should be relieved of the obligation to meet all deadlines in this case until  
 24 September 8, 2015. If, before September 8, 2015, the Commission has considered and either  
 25 approved or rejected the settlement offer, the Commission and Defendant Mendonsa will so inform  
 26 the Court immediately.

1 IT IS SO STIPULATED.

2 DATED: June 25, 2015

/s/ Charlene S. Shimada  
MORGAN, LEWIS & BOCKIUS LLP  
Charlene S. Shimada (SBN 91407)  
One Market, Spear Street Tower  
San Francisco, CA 94105  
Telephone: 415-442-1000  
Counsel for Defendant Ranjan Mendonsa

6 DATED: June 25, 2015


/s/ E. Barrett Atwood  
SECURITIES AND EXCHANGE  
COMMISSION  
Susan F. LaMarca (SBN 215231)  
Victor W. Hong (SBN 165938)  
E. Barrett Atwood (SBN 291181)  
44 Montgomery Street, Suite 2800  
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Telephone: 415-705-2500

**ORDER**

Good cause appearing from the above Stipulation, the requested suspension of all deadlines to September 8, 2015 as to Defendant Ranjan Mendonsa is hereby GRANTED. IT IS HEREBY ORDERED THAT the Plaintiff Securities and Exchange Commission and Defendant Mendonsa will report to the Court no later than September 8, 2015 to inform the Court whether a settlement between them has been approved by both parties.

IT IS SO ORDERED.

Dated: June 30, 2015

  
Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT JUDGE

**ATTESTATION**

I, Charlene S. Shimada, am the ECF User whose identification and password are being used to file the Stipulation. I hereby attest that each of the above parties or their representatives concurs in this filing.

Dated: June 25, 2015

\_\_\_\_\_  
/s/ Charlene S. Shimada  
Charlene S. Shimada

**CERTIFICATE OF SERVICE**

I, Mathew Djavaherian, am a citizen of the United States, over 18 years of age and not a party to this action. On June 25, 2015, I served the following documents:

- STIPULATION AND PROPOSED ORDER SUSPENDING DEADLINES AS TO DEFENDANT RANJAN MENDONSA

via US MAIL, to the following:

Roshanlal Chaganlal  
2183 Forino Drive  
Dublin, CA 94568

the following defendants were served via the Court's CM/ECF system:

Susan F. LaMarca, Esq.  
Victor W. Hong, Esq.  
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Securities and Exchange Commission  
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William Hugo Kimball  
Law Office of William H. Kimball  
803 Hearst Avenue  
Berkeley, CA 94710  
Attorney for Defendant Ammar Akbari

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California, on June 25, 2015.

/s/ Mathew Djavaherian  
Mathew Djavaherian